

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

IN RE GOOGLE INC. COOKIE  
PLACEMENT CONSUMER PRIVACY  
LITIGATION

Case No. 12-MD-2358 (ER)

This Document Relates to:  
**All Actions**

**JOINT STATEMENT BY PLAINTIFFS AND DEFENDANT GOOGLE INC.  
REGARDING CLASS NOTICE**

Pursuant to the Court's October 15, 2021 Preliminary Approval Order (ECF No. 203), Plaintiffs and Defendant Google Inc. submit this joint statement to advise the Court regarding the re-issuance of class notice.

Following the Court's October 15, 2021 Order, the parties conferred with the previously-selected class administrator, Epiq Systems Inc., regarding the cost and time necessary to re-issue notice to the class in an identical manner as the previously-provided class notice. The class administrator informed the parties that the fastest possible timeline to re-issue notice would require approximately 90 days and approximately \$274,150 in additional funds from the Settlement Fund. Consistent with the class administrator's advice and the Court's Order, the parties propose the following notice schedule, with each deadline below triggered by the date the Court approves the re-notice plan:

- Date Court approves re-notice plan + 30 days = Notice Date
- Notice Date + 42 days = End of Notice campaign (6 week notice campaign)
- End of Notice + 15 days = Opt-Out/Objection Deadline

- Opt-Out/Objection Deadline + 15 days = Counsel to inform Court of any Opt-Out/Objections
- Opt-Out/Objection Deadline + 30 days<sup>1</sup> = Final Approval Hearing

In addition, the parties wish to bring to the Court's attention that, pursuant to paragraph 7.1 of the Settlement Agreement, Google previously paid \$500,000.00 out of the Settlement Fund to implement the Notice Plan. Of that amount, the class administrator incurred costs and fees totaling \$270,093.29 in issuing the prior class notice, leaving \$229,906.71 of the original \$500,000.00 class notice allocation. The class administrator estimates that the cost to re-notice the settlement will be approximately \$274,150.00, an amount that exceeds the amount of money set aside for class notice in the Settlement Agreement. In order to comply with the Court's order to re-issue the notice of settlement to the class, Plaintiffs and Google propose, subject to approval by the Court, that Google contribute a further \$50,000 from the Settlement Fund towards class administration expenses.

DATED: November 12, 2021

/s/ Brian R. Strange

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<sup>1</sup> Or as soon thereafter as the Court is available.

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